

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA
ex rel. ESTELA MALDONADO,

Plaintiff/Relator,

v.

VIRGINIA SQUARE DENTAL,
PLLC, et al.,

Defendants.

Civil No. 1:18-cv-01278 (LMB/IDD)

FILED UNDER SEAL PURSUANT
TO TITLE 31 U.S.C. § 3730(b)(2)

FILED EX PARTE

JOINT NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE
AND
MOTION TO UNSEAL

Pursuant to Rule 41(a)(1)(i) of the Federal Rules of Civil Procedure, Estela Maldonado, Relator, voluntarily dismisses the claims in the complaint arising out of: (1) the False Claims Act, 31 U.S.C. § 3729 et seq., (Claims I and II); and (2) the Virginia False Claims Act, Va. Code Ann. § 8.01-216.3 (Claims IV and V), in the above-captioned action, against Virginia Square Dental, PLLC, JPD Dental, PLLC, Dr. Jamie Park, and Min Park, without prejudice to the United States and the Commonwealth of Virginia (collectively, "the Government") and with prejudice as to the Relator.

Pursuant to 31 U.S.C. § 3730(b)(1), the United States consents to the dismissal of Claims I and II without prejudice to the United States. Pursuant to Va. Code Ann. § 8.01-216.5(A), the Commonwealth of Virginia consents to the dismissal of Claims IV and V without prejudice to the Commonwealth of Virginia.

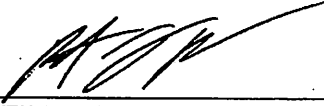
The Government submits that the sealing requirement of 31 U.S.C. § 3730(b)(2) and Va.

Code. Ann. § 8.01-216.5(B) is no longer needed, and requests that the Relator's Complaint, this Notice and Motion, and the attached proposed Order be unsealed. The Government requests that all other filings in this action remain under seal because in discussing the content and extent of the Government's investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

A proposed Order is submitted with this Notice and Motion.

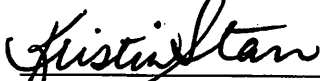
DATED this 30th day of September, 2019

WE ASK FOR THIS:



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AGREED TO:



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AGREED TO:

Peter Broadbent by *Kristin Stan, AUSA*

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September, 2019, I caused a copy of the **UNITED STATES' AND RELATOR'S NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE** and proposed **ORDER** to be served by first-class mail, postage prepaid, upon:

Robert Powers
Andrea Harris
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